

REMARKS

Claims 1-18 were pending in the application. Claims 1-18 have been cancelled. Applicant reserves the right to pursue the cancelled claims in a continuation application. Claims 19-21 are newly submitted. The specification and drawings (FIGs. 1-2) have been amended to correct minor informalities. No new matter has been added. Reconsideration is respectfully requested in view of the amendments to the claims and the following remarks.

I. The § 101 Rejections

Claim 1 was rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Claim 1 has been cancelled rendering this rejection moot.

II. The § 102/103 Rejections

Claims 1-7 and 13-15 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 7,051,101 (“Dubrovsky”).

Claims 3-4, 9-10, and 15-16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Dubrovsky in view of U.S. Patent Application Publication No. 2002/0171546 (“Evans”).

Applicant respectfully traverses the rejections.

Claim 19 recites a system for managing tables that are used by network processors to control network traffic through a network. In particular the system includes a host processor including a table management control application configured to respectively manage tables associated with a first network processor and tables associated with a second network processor through a first table management software application and a second table management software application. The table management control application is in communication with both the first

table management software application and the second table management software application through a plurality of generic application programming interfaces (APIs).

The plurality of generic application programming interfaces (APIs) includes a Table Enable application programming interface (API), a Table Disable application programming interface (API), a Table Lock application programming interface (API), and a Table Unlock application programming interface (API).

A. Dubrovsky Fails to Disclose a Table Enable/Disable Application Programming Interface (API) or a Table Lock/Unlock Application Programming Interface as recited in claim 19

Dubrovsky discloses a management station that includes a management application for establishing zones of related resources within a network (see Abstract). In particular, Dubrovsky permits a user (e.g., a system manager) to control and configure devices produced by different manufacturers through a generic set of zoning control commands provided by the management application (col. 8, ll. 28-38).

The Examiner recognizes, however, that Dubrovsky fails to disclose tables having states – including an enabled state, a disabled state, a locked state, or an unlocked state. Dubrovsky, therefore, fails to disclose a Table Enable application programming interface (API), a Table Disable application programming interface (API), a Table Lock application programming interface (API), or a Table Unlock application programming interface (API) as recited in claim 19.

B. Evans Fails to Disclose a Table Enable/Disable Application Programming Interface (API) or a Table Lock/Unlock Application Programming Interface as recited in claim 19

Evans discloses a customizable computer security system including a set of security input signals that each relate to a possible security event, and a rules engine responsive to the set of security input signals (see Abstract). Specifically, Evans discloses that possible security actions (in response to a security threat) include one or more of the following: shut down of computer and/or system, lock keyboard or mouse, turn off monitor, encrypt files, erase files, move files, destroy content of disk, sound an alarm, send location information, enable or disable boot block, change boot sequence, enable or disable hard drive lock, enable or disable operating system lock, connect or disconnect from network, prohibit access to files, applications, or servers, reset passwords, change authentication requirements, change access privileges for certain users, data, applications, or servers, deny access to encryption keys, enable or disable internet connection, or enable or disable e-mail (see paragraph [0014]).

Although Evans discloses changing an operational state of a hardware device in response to a security threat, Evans fails to disclose changing the state of a table that is used by network processors to control network traffic through a network. Consequently, Evans cannot disclose a Table Enable application programming interface (API), a Table Disable application programming interface (API), a Table Lock application programming interface (API), or a Table Unlock application programming interface (API) as recited in claim 19.

C. The claim has limitations not taught by either reference

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).

Dubrovsky and Evans fail to disclose a Table Enable application programming interface (API), a Table Disable application programming interface (API), a Table Lock application programming interface (API), or a Table Unlock application programming interface (API). Consequently, the combination of Dubrovsky and Evans cannot render claim 19 obvious.

For at least these reasons, Applicant submits that claim 19, and the claims that depend therefrom, are in condition for allowance.

Should any unresolved issues remain, the Examiner is invited to call the undersigned at the telephone number indicated below.

Respectfully submitted,
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